

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

KIM LOCKWOOD and V. KATHLEEN	)	
LOCKWOOD,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. CIV-23-170-R
	)	
STATE FARM FIRE AND CASUALTY	)	
COMPANY,	)	
	)	
Defendant.	)	

**JOINT MOTION FOR EXTENSION OF SCHEDULING ORDER DEADLINES**

Pursuant to Local Civil Rule 7.1, Plaintiffs Kim Lockwood and V. Kathleen Lockwood and Defendant State Farm Fire and Casualty Company (“State Farm”) (collectively, the “Parties”) respectfully request that the Court enter an Order extending all remaining deadlines in the scheduling order entered by this Court on April 6, 2023 (“Scheduling Order”), by sixty (60) days, re-setting the trial docket, and extending other deadlines as requested herein. In support, the Parties state as follows:

1. On April 6, 2023, the Court issued the original Scheduling Order in this case. Dkt. No. 10.
2. The parties have engaged in written discovery and expert discovery. Specifically, an inspection of the relevant property was held on August 18, 2023, and expert reports have been exchanged. Plaintiffs designated their expert witnesses on August 11, 2023, and State Farm designated its expert witness on August 25, 2023.

3. The Parties need to depose experts and take other depositions prior to the remaining pretrial deadlines. Due to limited availability of expert witnesses for depositions between the filing of the Parties' final expert witness lists and the current deadline to file dispositive and *Daubert* motions on October 16, 2023, the Parties will not have the opportunity to complete depositions of all identified expert witnesses prior to the *Daubert* motion filing deadline on October 16, 2023.

4. For this reason, the Parties have agreed to request a brief extension of the deadline to file dispositive and *Daubert* motions in the Scheduling Order, as well as all other remaining deadlines and the current January 2024 trial docket.

5. Therefore, good cause exists to modify the Scheduling Order as required by Federal Rule of Civil Procedure 16(b)(4).

6. The Parties request a sixty (60) day extension of all remaining deadlines in the Scheduling Order. The Parties also ask that the Court re-set the January 2024 trial docket in accordance with the 60-day extension of deadlines.

7. This extension is sought in good faith and not for the purpose of delay.

8. Undersigned counsel for the Parties have conferred amongst themselves and represent that both Parties consent to and request the relief requested in this Motion.

9. This is the first request for extension of deadlines to the Scheduling Order sought by the Parties.

10. A proposed order is being submitted to the Court herewith.

WHEREFORE, the Parties respectfully request that the Court grant this Motion and enter an order extending all remaining deadlines in the Scheduling Order by sixty (60) days, and re-setting the trial docket in accordance with the requested extensions.

Dated this 9th day of October, 2023.

Respectfully submitted,

/s/ Terry M. McKeever

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of October, 2023, I electronically transmitted the foregoing document to the Court Clerk using the ECF system of filing, which will transmit a Notice of Electronic Filing to the following ECF registrants:

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/s/ Andrew E. Henry

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